

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

CHARLIE JAVICE and OLIVIER AMAR,

Defendants.

Case No.: 1:23-cr-00251-AKH

DEFENDANT CHARLIE JAVICE'S NOTICE OF JOINDER

On January 27, 2025, Oliver Amar filed his Motion to Compel Disclosure and for Sanctions and accompanying memorandum of law. ECF Nos. 231, 232. Ms. Javice hereby gives notice that she joins the arguments and authorities cited in Mr. Amar's Memorandum of Law in support of his Motion to Compel Disclosure and for Sanctions and incorporates by reference her arguments in ECF Nos. 48, 51, 58. Ms. Javice respectfully requests the same relief sought in Mr. Amar's motion and the following additional relief as detailed below.

Should the Court grant the Motion in whole or in part with respect to requiring the production of additional communications, documents and other materials pursuant to the government's obligations under Rule 16, *Brady v. Maryland*, 373 U.S. 83 (1963) and *Giglio v. United States*, 405 U.S. 150 (1972) and their progeny, the Jencks Act (18 U.S.C. § 3500), or otherwise, Ms. Javice requests an adjournment of the trial date commensurate to the volume of such additional disclosures sufficient to ensure Ms. Javice's constitutional right to a fair trial. This continuance is necessary to bring the government into compliance with its constitutional obligations to Ms. Javice, and to give Ms. Javice a meaningful opportunity to review this previously hidden discovery to protect her Sixth Amendment right to effective assistance of counsel. *Delaware v. Van Arsdall*, 475 U.S. 673, 680 (1986); accord *United States v. Canter*, 338

F. Supp. 2d 460, 462 (S.D.N.Y. 2004) (agreeing impeachment materials, including prior witness statements, must be produced to the defendant pretrial noting that that is the “practice of this Court and of other courts in this district”).

For these reasons, and those set forth in Mr. Amar’s Motion to Compel Disclosure and for Sanctions and in ECF Nos. 48, 51, 58, Ms. Javice respectfully requests the Court grant Mr. Amar’s motion and grant the relief sought in the instant filing.

Respectfully submitted,

Dated: January 28, 2025

**QUINN EMANUEL URQUHART
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By: /s/ Sara C. Clark

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Counsel for Defendant Charlie Javice

CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2025, I caused a copy of the foregoing document to be served via ECF on counsel of record.

By: /s/ Sara C. Clark
Sara. C. Clark